

**BAKER & HOSTETLER LLP**

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*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:  
BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation  
of Bernard L. Madoff Investment Securities LLC  
and the Estate of Bernard L. Madoff,

Plaintiff,

v.

NATIXIS FINANCIAL PRODUCTS, LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05353 (SMB)

**NOTICE OF MOTION FOR LEAVE TO FILE AN AMENDED COMPLAINT**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law and the Declaration of Catherine E. Woltering in Support of Trustee's Motion for Leave to File an Amended Complaint, with all exhibits annexed thereto, and upon all the prior pleadings and proceedings herein, Irving H. Picard, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC (the "Trustee"), by and through his counsel, moves this Court, before the Honorable Stuart M. Bernstein, United States Bankruptcy Judge for the Southern District of New York, at the United States Bankruptcy Courthouse, One Bowling Green, New York, New York 10004, for an order granting the Trustee's Motion for Leave to File an Amended Complaint (the "Motion"), pursuant to Rule 15 of the Federal Rules of Civil Procedure (made applicable by Rule 7015 of the Federal Rules of Bankruptcy Procedure), together with such other and further relief as this Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that any responses or objections to the Motion must be: (i) in writing, conform to applicable rules of this Court and filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004 by no later than **February 26, 2019 at 4:00pm** (with a courtesy copy delivered to the Chambers of the Honorable Stuart M. Bernstein) and must be served upon: (a) Baker & Hostetler LLP, 45 Rockefeller Plaza, New York, New York, 10111, Attn: David J. Sheehan; and (b) Securities Investor Protection Corporation, 1667 K Street, N.W., Suite 10, Washington, DC 20006, Attn: Kevin Bell. Any objections must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection to the Motion.

**PLEASE TAKE FURTHER NOTICE** that the Trustee's reply papers shall be served and filed on or before **March 12, 2019 at 4:00pm**.

**PLEASE TAKE FURTHER NOTICE** that failure to file timely objections may result in the entry of an order granting the relief requested in the Motion without further notice to any party or an opportunity to be heard.

**PLEASE TAKE FURTHER NOTICE** that oral argument on this Motion remains to be scheduled by this Court.

Dated: New York, New York  
December 28, 2018

*/s/ Catherine E. Woltering*

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